

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

AARON GOINES, et al.,

Plaintiffs/Counter-Defendants,

v.

TITLEMAX OF VIRGINIA, INC., et al,

Defendants/Counter-Plaintiffs.

1:19-cv-489

**DEFENDANTS' MOTION FOR EXTENSION OF TIME TO SUBMIT
RESPONSE TO CERTAIN PLAINTIFFS' MOTIONS AND BRIEFS**

NOW COME Defendants TitleMax of South Carolina, Inc. and TitleMax of Virginia, Inc. (collectively, "TitleMax"), by and through the undersigned counsel, and hereby move this Court for an Order extending TitleMax's deadline to respond to certain Plaintiffs' motions and briefs (this "Motion") pursuant to Local Rule 7.3. TitleMax seeks a twenty-one (21) day extension to respond to the following motions: (1) Motion for Judgment and to Confirm Arbitration Award by Tommy White (ECF No. 209); (2) Motion for Judgment and to Confirm Arbitration Award by Margie Weavil (ECF No. 211); (3) Motion for Judgment and to Confirm Arbitration Award by Stephanie Jones (ECF No. 213); (4) Motion for Judgment and to Confirm Arbitration Award by Lorraine Sligh (ECF No. 215); (5) Motion for Judgment and to Confirm Arbitration Award by Michelle Keeling (ECF No. 217); (6) Motion for Judgment and to Confirm Arbitration Award by Melissa

Holder (ECF No. 219); (7) Motion for Judgment and to Confirm Arbitration Award by Rodney Hickman (ECF No. 221); (8) Motion for Judgment and to Confirm Arbitration Award by Dawn Houseton (ECF No. 223); (9) Motion for Judgment and to Confirm Arbitration Award by Tari Harris (ECF No. 225); (10) Motion for Judgment and to Confirm Arbitration Award by Frances Gaddy (ECF No. 227); (11) Motion for Judgment and to Confirm Arbitration Award by Jarrad Coxé (ECF No. 229); (12) Motion for Judgment and to Confirm Arbitration Award by Phillip Brown (ECF No. 231); (13) Motion for Judgment and to Confirm Arbitration Award by Willie Bradfield (ECF No. 233); (14) Motion for Judgment and to Confirm Arbitration Award by Katrina Campbell (ECF No. 235); and (15) Motion for Judgment and to Confirm Arbitration Award by Paulette Shannon (ECF No. 237) (collectively, the “Confirmation Motions”). TitleMax’s current deadline to respond to the Confirmation Motions is December 19, 2022.¹ This deadline has not yet expired and has not been previously extended by this Court. With the extension requested herein, TitleMax’s new deadline to respond to the Confirmation Motions would be January 9, 2023.

“Good cause” exists for the relief sought by this Motion. Specifically, TitleMax is in the process of hiring new counsel to represent them in the above-captioned matter and all other actions currently commenced by Plaintiffs’ counsel and pending with this Court.

¹ December 19, 2022 is TitleMax’s current response deadline, with the exception of the Motion for Judgment and to Confirm Arbitration Award filed by Paulette Shannon. Ms. Shannon’s Confirmation Motion was filed two days after all other Confirmation Motions referenced herein. Accordingly, TitleMax’s current deadline to respond to Ms. Shannon’s Confirmation Motion is December 20, 2022.

See Nicholson, et al. v. TitleMax of Virginia, Inc., et al., 1:19-cv-490, *Richards, et al. v. TitleMax of Virginia, Inc., et al.*, 1:20-cv-347, *Truesdale, et al. v. TitleMax of Virginia, Inc., et al.*, 1:22-cv-833, *Murphy, et al. v. TitleMax of Virginia, Inc., et al.*, 1:22-cv-971. TitleMax is in the finalizing this transition of representation to North Carolina counsel and expects that new counsel will appear in this action and all other actions noted *supra* within fourteen (14) days. The extension sought herein will provide new counsel with the time necessary to review and prepare appropriate responses to the Confirmation Motions. The extension will further provide the time necessary to effectuate the withdrawal of the undersigned and the substitution of new counsel of record for TitleMax. The undersigned conferred with Plaintiffs' counsel prior to the filing of this Motion. Plaintiffs' counsel does not oppose the twenty-one (21) day extension. A proposed Order granting this Motion will be provided to the Court for consideration.

WHEREFORE, TitleMax respectfully requests the Court enter an Order granting its extension of time to respond to the Confirmation Motions, through and including January 9, 2023. TitleMax further seeks any additional relief the Court deems just and proper.

This the 13th day of December, 2022.

s/ William J. Farley III
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